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July 17, 2019

The Honorable Paul A. Engelmayer
United States District Court
for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

BY ECF

Re: 19-cv-00113-PAE – *Flatt v. Doe* – Agreed Request for Two-Week Extension of
Time to File an Amended Complaint or Dismiss Case Without Prejudice

Dear Judge Engelmayer,

We write to respectfully request a two-week extension of time to file an amended complaint.¹ On June 4, 2019, the Court denied a joint motion for a stay and set July 18, 2019 as the deadline to file an amended complaint. Dkt. 17. The Court noted, however, that it was willing to entertain a request for a brief additional extension if the parties believed it was necessary to further facilitate settlement discussions. *Id.* Settlement discussions have been productive; the parties are currently considering a potential agreement that will resolve this case. The parties believe that a two-week extension (a deadline of August 1, 2019) to settle this case, file an amended complaint, or dismiss this lawsuit without prejudice will help bring this litigation to a close.

We appreciate the Court's attention in this matter.

Sincerely,

/s/ Justin V. Shur
Justin V. Shur
Jordan A. Rice

¹ Counsel for Defendant has indicated that they agree with this request.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of July, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties with an e-mail address of record who have appeared and consent to electronic service in this action.

Dated: July 17, 2019

/s/ Justin V. Shur

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